

Attorney's Docket No.: Intel 10559-239001/P8794

REMARKS

Claims 1-29 are pending. Claims 1, 12, and 18 are in independent form.

In the action mailed December 5, 2005, claim 1 was rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent No. 6,587,469 to Bragg (hereinafter "Bragg") and U.S. Patent No. 6,522,627 to Mauger (hereinafter "Mauger").

Claim 1 relates to an apparatus that includes a first component configured to forward data based on a lookup in a routing table and to replace a destination address in an Ethernet header of the data to identify a second component, the second component configured to receive the data; and an intermediate component bridging the first component and the second component to forward the data based on the replaced destination address.

The rejection asserts that Mauger describes a first component configured to replace a destination address in an Ethernet header to identify a second component, and a intermediate component bridging a first component and the second component to forward the data based on the replaced destination address, as recited in claim 1. Applicant respectfully disagrees.

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To begin with, Mauger neither describes nor suggests that a destination address in an Ethernet header is replaced to identify a second component. Indeed, Mauger describes just the opposite. In this regard, according to Mauger, MPLS packets include the original IP packet together with a stack of labels which are used by the MPLS nodes through which the packet passes to control the onward routing of the packet. At each node, the current packet label is used to determine the onward routing of the packet. See, e.g., Mauger, col. 4, line 30-37. The MPLS stack of labels are thus appended to the current header of a datagram and used to direct the datagram. Moreover, the destination address in the Ethernet header is understood to remain unchanged since Mauger's destination edge router forwards "the original IP packet" to the final destination. See Mauger, col. 5, line 9-10.

The rejection points to col. 6, line 1-3 as allegedly showing the replacement of a destination address in an Ethernet header to identify a second component. Applicant respectfully disagrees.

In this regard, in FIG. 4, Mauger describes a router or switch that uses an appended stack of MPLS labels to direct the original IP packet. In particular, a L2TP/Label Header Discriminator accesses the header information and executes any required addition or removal of packet labels. See, e.g.,

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Mauger, col. 5, line 58-61; col. 4, line 55-62. The header information is used to identify a required egress function and to modify the headers for onward transmission. See, e.g., Mauger, col. 5, line 61-64. The packet is then forwarded on a link to the required egress function. See, e.g., Mauger, col. 5, line 64-65.

Thus, when Mauger describes that "the header of the packet as modified by the ingress function provides all the control information required for egress," Mauger is describing the addition or removal of MPLS labels from the header, rather than a replacement of a destination address in an Ethernet header to identify a second component, as recited in claim 1.

Bragg does nothing to remedy this deficiency in Mauger. In particular, Bragg neither describes nor suggests replacing a destination address in an Ethernet header to identify a second component, as recited in claim 1. Accordingly, a *prima facie* case of obviousness has not been established. Applicant thus requests that the rejections of claim 1 and the claims dependent therefrom be withdrawn.

Claim 12 was rejected under 35 U.S.C. § 103(a) as obvious over Bragg and Mauger.

Claim 12 relates to a method that includes performing a lookup in a routing table to determine a path to send data from a sender to a receiver, replacing a destination address in an

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Ethernet header of the data to identify a second component connected to the receiver, and forwarding the data, based on the replaced destination address, through an intermediate component between a first component connected to the sender and the second component.

The rejection asserts that Mauger describes replacing a destination address in an Ethernet header of the data to identify a second component connected to the receiver, as recited in claim 12.

Applicant respectfully disagrees. In this regard, as discussed above, Mauger's MPLS packets include a stack of MPLS labels which are used to control the onward routing of the packet. Moreover, the destination address in the Ethernet header is understood to remain unchanged since Mauger's destination edge router forwards "the original IP packet" to the final destination.

Bragg does nothing to remedy this deficiency in Mauger. In particular, Bragg neither describes nor suggests replacing a destination address in an Ethernet header of the data to identify a second component connected to the receiver, as recited in claim 12. Accordingly, a *prima facie* case of obviousness has not been established. Applicant thus requests that the rejections of claim 12 and the claims dependent therefrom be withdrawn.

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Claim 18 was rejected under 35 U.S.C. § 103(a) as obvious over Bragg and Mauger.

Claim 18 relates to an article that includes one or more machine-readable media that store machine-executable instructions. The instructions are for causing one or more machines to perform a look up in a routing table to determine a path to send data from a sender to a receiver, replace a destination address in an Ethernet header of the data to identify a second component connected to the receiver, and forward the data, based on the replaced destination address, through an intermediate component between a first component connected to the sender and the second component.

The rejection asserts that Mauger describes instructions for causing one or more machines to replace a destination address in an Ethernet header of the data to identify a second component connected to the receiver, as recited in claim 18.

Applicant respectfully disagrees. In this regard, as discussed above, Mauger's MPLS packets include a stack of MPLS labels which are used to control the onward routing of the packet. Moreover, the destination address in the Ethernet header is understood to remain unchanged since Mauger's destination edge router forwards "the original IP packet" to the final destination.

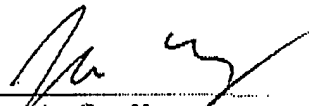
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Bragg does nothing to remedy this deficiency in Mauger. In particular, Bragg neither describes nor suggests instructions for causing one or more machines to replace a destination address in an Ethernet header of the data to identify a second component connected to the receiver, as recited in claim 18. Accordingly, a *prima facie* case of obviousness has not been established. Applicant thus requests that the rejections of claim 18 and the claims dependent therefrom be withdrawn.

Applicant asks that all claims be allowed. No fees are believed due at this time. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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